

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITE HERE HEALTH, <i>et al.</i> ,)	
)	
Plaintiffs,)	CIVIL ACTION
)	
vs.)	NO. 15 C 8203
)	
LE PERIGORD, INC., d/b/a LE PERIGORD)	JUDGE AMY J. ST. EVE
RESTAURANT,)	
)	
Defendant.)	

MOTION FOR ENTRY OF DEFAULT AND JUDGMENT

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, LE PERIGORD, INC., d/b/a LE PERIGORD RESTAURANT, in the total amount of \$126,920.43, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$967.50.

On September 25, 2015, the Summons and Complaint was served on the Defendant (by tendering a copy of said documents to Christopher Briguet, Manager) at the Defendant's place of business (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on October 16, 2015. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Laura M. Finnegan

CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Motion for Entry of Default and Judgment) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 9th day of November 2015:

Mr. Georges Briguet
Le Perigord, Inc., d/b/a Le Perigord Restaurant
405 E. 52nd Street
New York, NY 10022-6387

/s/ Laura M. Finnegan

Laura M. Finnegan
Attorney for Plaintiffs
BAUM SIGMAN AUERBACH & NEUMAN, LTD.
200 West Adams Street, Suite 2200
Chicago, IL 60606-5231
Bar No.: 6210637
Telephone: (312) 216-2563
Facsimile: (312) 236-0241
E-Mail: lmfinnegan@baumsigman.com